

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

AUG 11 1997

S. EPA, REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

I L D 9 8 4 9 0 8 2 0 2

II. Name of Installation (Include company and specific site name)

S A F E T Y - K L E E N C O R P .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

Location update

C O N E B R I N K M A N W A Y

Street (Continued)

City or Town

E L G I N

State

I L

Zip Code

6 0 1 2 3 -

County Code

0 8 9

County Name

K A N E

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

Location update

C O N E B R I N K M A N W A Y

City or Town

E L G I N

State

I L

Zip Code

6 0 1 2 3 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

W A R N E R

(First)

T E D

Job Title

R E G E N V M A N A G E R

Phone Number (Area Code and Number)

7 0 8 - 2 0 1 - 2 6 0 9

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other☐☒☐

B. Street or P.O. Box

6 1 5 E 1 3 8 T H S T R E E T P O 6 0 4

City or Town

D O L T O N

State

I L

Zip Code

6 0 1 4 9 -

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

S A F E T Y - K L E E N C O R P .

Street, P.O. Box, or Route Number

C O N E B R I N K M A N W A Y

City or Town

L G I N

State

I L

Zip Code

6 0 1 2 3 -

Phone Number (Area Code and Number)

8 0 0 - 6 6 9 - 5 8 4 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

X

No

(Date Changed)

Month

Day

Year

6175 856 680

RCRIS ENTRY AUG 14 1997

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)
MAR 12 1997

U. S. EPA, REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)☐

A. First Notification

☒B. Subsequent Notification
(Complete item C)**C. Installation's EPA ID Number**

I L D 9 8 4 9 0 8 2 0 2

II. Name of Installation (Include company and specific site name)

S A F E T Y - K L E E N C O R P .

III. Location of Installation (Physical address not P.O. Box or Route Number)**Street**

1 0 0 0 N O R T H R A N D A L L R O A D

RECEIVED

Street (Continued)

MAR 06 1997

City or Town

E L G I N

State

I L

Zip Code

6 0 1 2 3 -

County Code

0 8 9

County Name

K A N E

IV. Installation Mailing Address (See Instructions)**Street or P.O. Box**

1 0 0 0 N O R T H R A N D A L L R O A D

City or Town

E L G I N

State

I L

Zip Code

6 0 1 2 3 -

V. Installation Contact (Person to be contacted regarding waste activities at site)**Name (Last)**

W A R N E R

(First)

T E D

Job Title

R E G E N V M A N A G E R

Phone Number (Area Code and Number)

7 0 8 - 2 0 1 - 2 6 0 9

VI. Installation Contact Address (See Instructions)**A. Contract Address**
Location Mailing Other☐☒☐**B. Street or P.O. Box**

6 1 5 E 1 3 8 T H S T R E E T P O 6 0 4

City or Town

D O L T O N

State

I L

Zip Code

6 0 4 1 9 -

VII. Ownership (See Instructions)**A. Name of installation's Legal Owner**

S A F E T Y - K L E E N C O R P .

Street, P.O. Box, or Route Number

1 0 0 0 N R A N D A L L R O A D

City or Town

E L G I N

State

I L

Zip Code

6 0 1 2 3 -

Phone Number (Area Code and Number)

8 0 0 - 6 6 9 - 5 8 4 0

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

X

No

(Date Changed)
Month Day Year

RCRIS ENTRY APR 11 1997

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

FEB 16 1993

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

IL0984908202

II. Name of Installation (Include company and specific site name)

0894385219

S a f e t y - K l e e n C o r p .

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

1000 N. Randall Road

Street (continued)

City or Town

E l i g i n

State

IL

ZIP Code

60123-

County Code

County Name

K a n e

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

1000 N. Randall

City or Town

E l i g i n

State

IL

ZIP Code

60123-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

E l i e n

(first)

J u r c z a k

Job Title

E n v . A f f a i r s M g r .

Phone Number (area code and number)

708-697-8931

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

☒

B. Street or P.O. Box

S a m e a s L o c a t i o n

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

S a f e t y - K l e e n C o r p .

Street, P.O. Box, or Route Number

1000 N. Randall Road

City or Town

E l i g i n

State

IL

ZIP Code

60123-

Phone Number (area code and number)

708-697-8931

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)

Month

Day

Year

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

JAN 06 1993

U.S. EPA REGION 1

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

ILD 9 8 4 9 0 8 2 0 2

II. Name of Installation (Include company and specific site name)

0894385219

SAFETY-KLEEN CORP.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

950 N. RANDALL ROAD

Street (continued)

City or Town

ELGIN

State

ZIP Code

IL 60123-

County Code

County Name

089 KANE

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

950 N. RANDALL ROAD

City or Town

ELGIN

State

ZIP Code

IL 60123-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

JURCZAK

(first)

ELLEN

Job Title

ENV. AFFAIRS MGR.

Phone Number (area code and number)

708-697-8460

VI. Installation Contact Address (See Instructions)

A. Contact Address
Location Mailing

☒

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

SAFETY-KLEEN CORP.

Street, P.O. Box, or Route Number

950 N. RANDALL ROAD.

City or Town

ELGIN

State

ZIP Code

IL 60123-

Phone Number (area code and number)

708-697-8460

B. Land Type

P

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)
Month Day Year

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



N93.092

United States Environmental Protection Agency

Notification of Regulated Waste Activity

Date Received
(For Official Use Only)

NOV 24 1992

U.S. EPA REGION IV

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

160984908202

II. Name of Installation (Include company and specific site name)

SAFETY-KLEEN CORP.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

950 E. RANDALL ROAD

Street (continued)

City or Town

ELGIN

State

IL

ZIP Code

60123-

County Code

County Name

KANE

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

950 E. RANDALL ROAD

City or Town

ELGIN

State

IL

ZIP Code

60123-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

JURCZAK

(first)

ELLEN

Job Title

ENV. AFFAIRS MGR

Phone Number (area code and number)

708-697-8460

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

SAFETY-KLEEN CORP.

Street, P.O. Box, or Route Number

950 E. RANDALL ROAD

City or Town

ELGIN

State

IL

ZIP Code

60123-

Phone Number (area code and number)

708-697-8460

B. Land Type

P

C. Owner Type

P

D. Change of Owner
Indicator

Yes

No

(Date Changed)
Month Day Year



Certified Mail
November 3, 1992

Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, IL 62706

Subject: Notification of Regulated Waste Activity
Safety-Kleen Corporate Headquarters
Elgin, IL

Dear Mr. Pierce,

In March of 1993, Safety-Kleen Corp. will be relocating its corporate headquarters to a new location in Elgin, IL. Most of our vehicles used to transport hazardous materials are registered out of the corporate office. Safety-Kleen is therefore applying for a new EPA I.D. number as a transporter only. Until our anticipated move in date of March, 1993, please direct all correspondence to our current address on 777 Big Timber Rd., Elgin, IL 60123.

If you have any questions or comments, please feel free to contact me at 708/697-8931.

Sincerely,

Jennifer M. Jendras
Environmental Specialist
Chicago Region

cc: Ellen Jurczak

RECEIVED
NOV 10 1992
IEPA/DLPC

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

**EPA**

N93092

United States Environmental Protection Agency

**Notification of
Regulated Waste
Activity**Date Received
(For Official Use Only)

NOV 24 1992

U.S. EPA REGION IV

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

A. First Notification

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

JL0984908202

II. Name of Installation (Include company and specific site name)

SAFETY-KLEEN CORP.

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

950 E. RANDALL ROAD

Street (continued)

City or Town

ELGIN

State

ZIP Code

IL

60123-

County Code

County Name

089

KANE

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

950 E. RANDALL ROAD

City or Town

ELGIN

State

ZIP Code

IL

60123-

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

JURCZAK

(first)

ELLEN

Job Title

ENV. AFFAIRS MGR

Phone Number (area code and number)

708-697-8460

VI. Installation Contact Address (See instructions)A. Contact Address
Location Mailing

B. Street or P.O. Box

SAME

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

SAFETY-KLEEN CORP.

RECEIVED

Street, P.O. Box, or Route Number

950 E. RANDALL ROAD

NOV 10 1992

City or Town

ELGIN

State

ZIP Code

IL

60123-

Phone Number (area code and number)

708-697-8460

B. Land Type

P

C. Owner Type

P

D. Change of Owner
Indicator

Yes

No

(Date Changed)

Month

Day

Year



RECEIVED

AUG 11 1997

U. S. EPA, REGION V
SWB — PMS

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Z 773 754 758

July 25, 1997

Mr. Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, Illinois 62794

RECEIVED

JUL 30 1997

Re: Notification of Regulated Waste Activity
Safety-Kleen Corporate Headquarters
Elgin, Illinois 60123
ILD984908202

Dear Mr. Pierce:

Please find enclosed an updated copy of the Notification of Regulated Waste Activity for the Safety-Kleen Corp. Corporate Headquarters. Although the physical location has not changed, the address has been changed from 1000 North Randall Road to One Brinkman Way. The form has been revised to include a change in the location of the installation, installation mailing address, and ownership address. Please update your records accordingly.

If you have any questions, please call me at 847/468-6580.

Sincerely,

Kyle Schawel
Environment, Health and Safety Manager
Safety-Kleen Corp.

RECEIVED

SEP 24 1997

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U. S. EPA — REGION 5



RECEIVED
MAY 16 1997

RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U. S. EPA—REGION 5
Z 773 754 826

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

March 3, 1997

Mr. Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, Illinois 62794

RECEIVED

MAR 12 1997

U. S. EPA, REGION V
SWB—PMS

Re: Notification of Regulated Waste Activity
Safety-Kleen Corporate Headquarters
Elgin, Illinois 60123
ILD984908202

RECEIVED
MAR 06 1997

Dear Mr. Pierce:

Please find enclosed an updated copy of the Notification of Regulated Waste Activity for the Safety-Kleen Corp. Corporate Headquarters. The form has been revised to include a change in the installation contact, installation contact address, and phone number of the location's legal owner. Please update your records accordingly.

If you have any questions, please call me at 847/468-6580.

Sincerely,

Kyle Schawel
Environment, Health and Safety Manager
Safety-Kleen Corp.

Like



RECEIVED
WMD RCRA
RECORD CENTER

JUL 29 1993

RECEIVED

JUL 06 1993

U. S. EPA, REGION V
SWB — PMS

June 16, 1993
93-022

Ms. Michelle Holtom
U.S. EPA Region V
Ohio RCRA Activities
Waste Management Div.
230 South Dearborn St.
Chicago, IL 60604

RE: Change of Address for Safety-Kleen's Corporate Headquarters

Dear Ms. Holtom:

Safety-Kleen Corporation is moving its corporate headquarters on June 3, 1993. Effective June 7, 1993, my new address will be:

Safety-Kleen Corporation
Environmental, Health, and Safety Dept.
1000 North Randall Road
Elgin, IL 60123-7857

My telephone number will remain the same; however, our department's fax number will be different. They are:

Telephone No. (708) 468-2216
Fax No. (708) 468-8535

Enclosed is my new business card for your convenience.

Sincerely,

Scott Davies

Scott Davies
Senior Project Manager - Remediation

SED/njs

ILD 984 908 202

*IEPA
07-02-93
Sim*



RECEIVED

FEB 16 1993

U. S. EPA, REGION V
SWB - PMS

Certified Mail
February 2, 1993

Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, IL 62706

Subject: Notification of Regulated Waste Activity
Safety-Kleen Corporate Headquarters
Elgin, IL

Dear Mr. Pierce,

Safety-Kleen Corp. is in the process of relocating its corporate headquarters and had previously sent to you a Notification of Hazardous Waste Activity to obtain an installation EPA I.D. number. Safety-Kleen has received our new EPA I.D. number, unfortunately the proposed address for our relocated headquarters has been changed. Our new location's address will be changed to 1000 N. Randall Road not 950 N. Randall Road as previously determined.

Please find enclosed a subsequent Notification of Hazardous Waste Activity listed the new street address. If you have any questions or require additional information, please feel free to contact me at 708/697-8931. All correspondence should be directed to our location at 777 Big Timber Road, Elgin, IL 60123 until our relocation date in April, 1993.

Sincerely,

Jennifer M. Jendras
Environmental Specialist
Chicago Region

cc: Cindy Tarka
Denis Padovani
Ellen Jurczak

RECEIVED

FEB 16 1993

EPA/DLPC

Certified Mail
December 22, 1992



RECEIVED

JAN 06 1993

U. S. EPA, REGION V
SWB - PMS

ILD 984908202

Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road, #24
Springfield, IL 62706

Subject: Notification of Regulated Waste Activity
Safety-Kleen Corporate Headquarters
Elgin, IL

Dear Mr. Pierce,

On November 3, 1992, Safety-Kleen submitted to you a Notification of Regulated Waste Activity to obtain an Installation EPA I.D. number for the relocation of our new corporate headquarters. Since that time, Safety-Kleen has received an EPA I.D. number for our new location. Upon review of the Notification of Regulated Waste Activity Form, an error was noted. Our new location's address is 950 N. Randall Road, not 950 E. Randall Road as listed on the November 3, 1992 submittal. *Change*

Please find enclosed a subsequent Notification of Regulated Waste Activity listing the correct street direction. In addition this form also lists air, rail and water as well as highway as methods of hazardous waste transportation for our vehicles registered out of our corporate office.

If you have any questions, please feel free to contact me at 708/697-8931. All correspondence should be directed to our location at 777 Big Timber Road, Elgin, IL 60123 until our relocation date in March, 1993.

Sincerely,

Jennifer M. Jendras

Jennifer M. Jendras
Environmental Specialist
Chicago Region

cc: Ellen Jurczak
Denis Padovani
Cindy Tarka

RECEIVED

DEC 22 1992

DLPC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER

MAY 27 1994

MAY 26 1994

REPLY TO THE ATTENTION OF:

HRE-8J

Mr. Robert Mueller
Safety-Kleen
1000 N. Randall Road
Elgin, Illinois 60123-7857

Re: Compliance Assistance

Dear Mr. Mueller:

ILD 984 908 202

Thank you for your letter dated February 21, 1994, concerning 140 flash point solvent and waste oil. This letter is intended to provide you with a United States Environmental Protection Agency (U.S. EPA) perspective and response to your questions. Please note that Illinois has independent state authority to regulate "waste oil" (as defined by the State) which is not part of the U.S. EPA's Resource Conservation and Recovery Act (RCRA) hazardous waste program. Illinois is also authorized to implement and enforce a hazardous waste management program in place of RCRA.

The used oil fuel regulations currently effective in Illinois were published by the U.S. EPA as a final rule in the November 29, 1985 Federal Register and were immediately implemented by the U.S. EPA under RCRA. Illinois subsequently became authorized to implement State used oil fuel regulations in place of the U.S. EPA's regulations. In 1992, U.S. EPA promulgated new used oil management standards (RCRA regulations) that address the entire used oil universe, not just used oil fuel. These 1992 used oil management standards are not enforceable in Illinois by U.S. EPA until Illinois is authorized by U.S. EPA for these regulations. The Illinois Environmental Protection Agency (IEPA) has already adopted similar state regulations which IEPA may enforce using its own authority. Illinois will be authorized to implement these state regulations in lieu of U.S. EPA's regulations in the near future.

In order to respond to your letter, a clarification is necessary. The RCRA regulations address "used oil", not waste oil. The currently effective Federal definition of used oil was codified at Title 40 of the Code of Federal Regulations (CFR) Part 266, section 266.40(b) :

"'used oil' means any oil that has been refined from crude oil, used, and, as a result of such use, is contaminated by chemical and physical impurities" (40 CFR 266.40(b), 1992).

As described in the November 29, 1985 preamble to the final rule, used oils include spent automotive lubricating oils, spent industrial oils, and spent industrial process oils. (More detail is provided on page 49174, Vol. 50, No. 230; 50 FR 49174.) The U.S. EPA generally considers used oil to include used lubricants, used heat transfer fluids, and used hydraulic fluids. The



difference (as perceived by U.S. EPA) between "used oil" and "waste oil" is that used oil does not include waste, unused oil. Also, "used oil" does not include oily wastes such as clean-out waste from virgin fuel oil storage tanks or virgin petroleum spills. Such materials are not subject to U.S. EPA used oil regulations unless they have been mixed with a used oil and do not exhibit any characteristics of hazardous waste. Finally, although antifreeze is a heat transfer fluid, U.S. EPA does not consider used antifreeze to be a used oil.

The second paragraph of your letter uses the term "waste oil furnace." Under the 1985 and 1992 Federal used oil fuel regulations (40 CFR 266, Subpart E (1986-1992), as adopted by Illinois and authorized by U.S. EPA, and 40 CFR 279.12(c) (1993)), off-specification used oil fuel may be burned only in three types of devices: industrial furnaces as defined in 40 CFR 260.10 and boilers as defined in 40 CFR 266.41(b)(2) (1986-1992) or 40 CFR 279.61(a)(2), including used oil-fired space heaters. (Burning of used oil fuel that has been determined to meet the specifications for arsenic, cadmium, chromium, lead, flash point, and total halogens is not limited to particular types of devices.) For the purpose of preparing this response, I will assume that you intended to ask about used oil-fired space heaters.

The remainder of this letter responds to your questions in the same order as presented in your February 21, 1994 letter. Note that some questions have been rephrased to make terminology similar to the regulations. Changes are denoted by bold type.

1. How much **used oil** can be stored, and for what length of time?

Under the 1985 used oil fuel standards, there is no volumetric or accumulation time limit on the storage of used oil fuel, but a regulatory agency could make the determination that the used oil was being accumulated speculatively (i.e., 75% of the material was not being recycled within one calendar year) and require compliance with hazardous waste regulations.

Under the 1992 used oil management standards, the U.S. EPA presumes that the used oil is to be recycled unless a used oil handler disposes of used oil or sends used oil for disposal. There is no volumetric or accumulation time limit on the storage of used oil, except that transporters or transfer facilities storing used oil for more than 35 days are subject to the standards for used oil processors and re-refiners.

2. How much **spent** solvent can be stored, and for what length of time?

The generator of the spent solvent must determine first whether the spent solvent is a listed waste and second (if it is not listed), whether the spent solvent exhibits a characteristic of hazardous waste. (The hazardous waste characteristics include ignitability, toxicity, reactivity, and corrosivity.) If the spent solvent is a hazardous waste, the generator must comply with the standards applicable to generators of hazardous waste (in particular, 40 CFR 262.34). These

regulations impose increasing levels of regulatory requirements with increasing generation rates of hazardous waste. That is, different generator standards apply to generators of less than 100, between 100 and 1,000 and over 1,000 kilograms per calendar month of hazardous waste. If the spent solvent is not a hazardous waste, RCRA hazardous waste regulations do not apply.

3. What tests, if any, must be done before mixing **spent** solvent and **used** oil together?

The generator of the spent solvents must determine whether the spent solvents are a listed or characteristic hazardous waste. See the response to #5, below, for more detail.

The concentration of total halogens in the used oil should be determined; if it is over 1,000 ppm, the used oil is presumed to have been mixed with a listed, halogenated hazardous waste. This presumption may be rebutted by demonstrating, for example, that no significant concentrations of halogenated hazardous waste constituents are present (through analysis for specific constituents).

Under the 1985 used oil fuel standards, mixture of a solid waste (used oil) with listed hazardous waste results in a greater volume of listed hazardous waste. Mixture of a solid waste (used oil) with a characteristic waste (e.g., spent solvent exhibiting a characteristic of toxicity) would result in a hazardous waste only if the mixture still exhibited the characteristic.

Under the 1992 used oil management standards, mixture of used oil and hazardous waste listed for acute hazards (H) or toxicity (T) (see 40 CFR 261.30) would result in a listed hazardous waste. Mixture of used oil and a solid waste exhibiting a characteristic of hazardous waste would result in a hazardous waste if the resulting mixture exhibited any characteristic of hazardous waste. Mixtures of used oil and a solid waste exhibiting only the characteristic of ignitability would result in a used oil provided the mixture no longer exhibited the characteristic of ignitability; if the mixture still exhibits the characteristic of ignitability, it would be regulated as a hazardous waste. See 40 CFR 279.10.

4. What should be done with the sludge that is removed from the parts washers?

The generator of the sludge should determine whether the sludge is a solid waste, as defined in 40 CFR 261.2. Note that sludges from the bottom of a parts washer are by-products and do not meet the regulatory definition of "sludge." If the sludge is a solid waste, the generator should determine whether the solid waste has been excluded from regulation, has been listed as a hazardous waste, or exhibits a characteristic of hazardous waste. I anticipate that the sludge will be a solid waste, possibly exhibiting a characteristic of hazardous waste. The sludge should be managed in compliance with applicable hazardous

waste standards in 40 CFR 262 and 268. (See the discussion of mixture, in #3, above.)

5. Should a TCLP test be done to any of the waste streams from above?

The generator of the spent solvents and parts cleaner sludge must identify the applicable hazardous waste code(s) for each waste stream. This may be done by testing the waste or by applying knowledge of the materials used, the generating process, and the possibility of contamination with other materials. TCLP test results would be relevant in evaluating whether the spent solvent, parts washer sludge, or mixture of used oil and characteristic waste exhibit the characteristic of toxicity. According to a RCRA Hotline monthly summary for January 1994, total waste analysis may be used in making toxicity characteristic determinations. (See enclosure.)

6. Are there any risks being taken from this practice? (business compliance)

I am unaware of any business risks due to compliance with applicable Federal environmental regulations.

7. Are there any risks to the environment, land, or air from this practice?

In making the determination not to list used oil destined for recycling as a hazardous waste, the U.S. EPA addressed the technical criteria for listing of waste as hazardous under 40 CFR 261.11(a)(3), particularly "the plausible types of improper management to which the waste could be subjected" (40 CFR 261.11(a)(3)(vii)). The preambles to the 1992 final used oil decisions not to list used oil destined for disposal (May 20, 1992) and used oil destined for recycling (September 10, 1992) describe how regulations promulgated under other statutory authorities apply to used oil.

Commenters expressed concern about burning used oil for energy recovery in response to the January 11, 1985 proposal that resulted in the November 29, 1985 final rule and in response to the September 23, 1991 Supplemental Proposal. With respect to the specification level for lead in used oil fuel, the 1985 final rule preamble states,

"Although 100 ppm appears to be protective with respect to the [National Ambient Air Quality Standards] NAAQS, that level may not be protective because health effects data available since the lead NAAQS was established indicate that lead causes serious, but apparently noncancerous, health effects at any level of exposure (i.e., lead appears to be a 'nonthreshold' pollutant). EPA is considering these new health effects data in its current efforts to determine whether the existing lead NAAQS is adequately protective" (50 FR 49184).

Later in the November 29, 1985 preamble, the 100 ppm lead specification

level was described as an interim measure and U.S. EPA indicated the risks and costs of a lower lead level would be considered in conjunction with permit standards for boilers and industrial furnaces (50 FR 49185).

The September 10, 1992 final rule preamble acknowledges concerns raised over burning used oil as a fuel and, in particular, the lead specification of 100 ppm. During U.S. EPA's preparation of the 1992 final used oil rules, the Sierra Club published a report focused on the hazards of lead emissions from burning used oil fuel for energy recovery. According to the preamble, "the Agency plans to study these issues" (57 FR 41576). Other commenters on the used oil proposed rule and supplemental proposal cited 63 Superfund sites for which listing on the National Priorities List was attributed to used oil mismanagement. As stated in preamble to a final rule, the Agency has not been able to adequately quantify the benefits to the environment or to human health of these management standards, due to the lack of comprehensive data on the frequency and extent of used oil releases to the environment (September 10, 1992, 57 FR 41607).

8. Are there any storage limits or time limits on the sludge and other by products that can't be burned?

See the response to #2, above.

9. Could solvent after being used in parts washers have been contaminated with something to prevent it from being mixed with used oil? What are some of these contaminants used in an average **vehicle maintenance** repair shop?

Yes, the potential exists for mixture of spent solvent from parts washers with other hazardous wastes. Mixture of spent solvents with used oil is generally discouraged so that the spent solvents can be recycled for use as solvent and so that the used oil can be processed and reused. On the waste management hierarchy, burning for energy recovery is less desirable than distillation or processing and reuse.

Typical waste streams produced by small quantity generators in the business of vehicle maintenance include acids/bases, heavy metals/inorganics, ignitable wastes, lead acid batteries, and solvents.

10. In your opinion, should a business take part in such a practice, and are there any changes coming that could greatly affect this type of waste disposal method?

To the extent that burning used oil for energy recovery prevents land disposal of the used oil and reduces virgin fuel consumption, it is consistent with the Agency's goals. As noted in the response to #9, burning used oil for energy recovery is less desirable than processing for reuse or reducing waste generation rates.

The November 29, 1985 preamble describes two basic designs for used oil fired space heaters, vaporization type and atomization type.

Vaporization types appeared to have low metals emission rates (5 to 15% of the metals emitted) in comparison to atomization types' relatively high metals emission rates (75% to 95%) (50 FR 49194). If you are concerned about air emissions, you may want to ask manufacturers whether the unit they manufacture is an atomization or vaporization type.

With respect to changes coming, a new hazardous waste identification rule has been in preparation for several years. This rule will affect how mixtures of regulated wastes are characterized.

If you do not already have copies of the Illinois Environmental Protection Agency hazardous waste regulations, you or your environmental consultant should obtain a copy. You may contact the IEPA's Maywood District Office with questions about the State regulations at (708) 338-7900. Questions about the Federal hazardous waste and used oil regulations may be directed to the RCRA Hotline at (800) 424-9346. If you have any questions about this letter, you may contact me at (312) 353-6134.

Sincerely yours,



Sue Rodenbeck Brauer, RCRA Used Oil Expert
RCRA Enforcement Branch

Enclosure

cc: Cliff Gould, IEPA Maywood District Office

MAR 28 1995

HRE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas M. Giller
Associate Counsel - Environmental
Safety-Kleen Corp.
100 North Randall Road
Elgin, IL 60123-7857

Re: Consent Agreement
and Final Order for
Safety-Kleen Corp.
Docket Nos.
V-W-003-93, V-W-004-93,
and V-W-005-93

Dear Mr. Giller:

This letter acknowledges receipt of the Consent Agreement and Final Order for the Safety-Kleen Corp. facilities located at 1302 18th Street, Cloquet, Minnesota 55720; 3227 Terminal Drive, Eagan, Minnesota 55121; and Lots 1 & 2, Hokanson Industrial Park, Blaine, Minnesota 55424. A fully executed copy is enclosed for your files. Thank you for your cooperation in resolving this matter.

Sincerely yours,
Original Signed by
Norman R. Niedergang

Norman R. Niedergang
Associate Director for RCRA
Waste Management Division

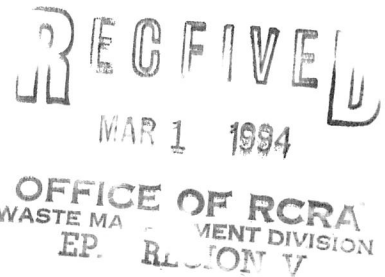
Enclosure

cc: Ignacio Arrazola

ILD 984 908 202

2-21-94

United States Environmental Protection Agency
Region 5
77 West Jackson Blvd.
Chicago, IL 60604-3590
~~George J. Hamper~~ *Sue Rodenbeck Braver*
Chief Illinois Section
RCRA Permitting Branch



Dear Sir:

I need some clear definitions and steps to keep my business in compliance with EPA standards.

If a business buys an above 140 flash point solvent to use in its parts washers so it can be mixed with waste oil to be burned in a waste oil furnace, what should be done to keep that business in compliance?

1. How much waste oil can be stored, and for what length of time?
2. How much used solvent can be stored, and for what length of time?
3. What tests, if any, must be done before mixing used solvent and oil together?
4. What should be done with the sludge that is removed from the parts washers?
5. Should a TCLP test be done to any of the waste streams from above?
6. Are there any risks being taken from this practice? (Business Compliance)
7. Are there any risks to the environment, land, or air from this practice?
8. Are there any storage limits or time limits on the sludge and other by products that can't be burned?
9. Could solvent after being used in parts washers have been contaminated with something to prevent it from being mixed with oil? What are some of these contaminants used in an average repair shop?
10. In your opinion, should a business take part in such a practice, and are there any changes coming that could greatly effect this type of waste disposal method?

Thank you,

Robert Mueller
Robert Mueller



MARYLAND DEPARTMENT OF THE ENVIRONMENT
2500 Broening Highway • Baltimore, Maryland 21224
(410) 631-3000

ILD 984908 202

William Donald Schaefer
Governor

David A.C. Carroll
Secretary

November 24, 1993

RECEIVED DEC 06 1993
WMD RCRA
RECORD CENTER

U.S. EPA Region V
RCRA Activities
Waste Management Division
P. O. Box A3587
Chicago IL 60690

RE: Safety-Kleen Corporation

Gentlemen:

In accordance with Maryland regulations, COMAR 26.13.04 Standards Applicable to Transporters of Hazardous waste, a person may not transport a Controlled Hazardous Substance (CHS) to a facility within the State or from a source within the State unless the person obtains a certificate from the Department. When our Department receives an application from a person who intends to transport wastes to a facility outside of Maryland or an out-of-state transporter who wishes to deliver waste to a Maryland facility, it is our policy to notify that State before issuing a permit. We request that you review the attached application.

If your Department has any objections to the applicant being issued a permit by the Maryland Department of the Environment, please notify us in writing or via telephone at (410) 631-3344 within ten (10) days.

Thank you for your cooperation.

Sincerely,

Emily S. Troyer
Emily S. Troyer, Chief
Tracking/Toxics Inventory Division
Hazardous Waste Program

EST:spb

cc: Mr. Richard W. Collins
Hauler File



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

June 13, 2000

Safety-Kleen Corporation
Attn: Phillip Retallick
1301 Gervais Street, Suite 300
Columbia, South Carolina 29201

Re: 9450000000 -- State of South Carolina
Safety-Kleen Corporation
Log No. PS00-048
RCRA Permit File

RECEIVED
JUN 14 2000
IEPA-DLPC

Dear Mr. Retallick:

This letter has been written in response to your letter dated March 15, 2000 regarding Safety-Kleen's "continued-use program". The continued-use program collects used solvents from Safety-Kleen customers for use in cleaning drums at Safety-Kleen branch facilities or use in scrap metal washing at a Safety-Kleen facility in Kentucky. As discussed previously we have focused our response on the drum washing program. In your letter you asked that the State of Illinois concur that solvents in the continued-use program are considered to be exempt from the definition of a "solid waste" and hence not a "hazardous waste". The Illinois EPA has carefully reviewed the information dated April 25, 1997, October 13, 1997, July 17, 1998, September 1, 1998, February 8, 1999, May 14, 1999 and March 15, 2000. The State of Illinois cannot concur that Safety-Kleen's continued-use program qualifies for any exclusion from the definition of solid waste. In your letter you indicate that approval for the continued use program has been given by USEPA. The letter from USEPA was conditional. It is the conditions of the USEPA letter which highlight the same concerns that the Illinois EPA has with the continued-use program. Our reasons are as follows:

1. The continued-use solvent must not only substitute for a commercial product, but it must also be an "effective" substitute. Safety-Kleen has provided no information which demonstrates that the continued-use solvent is an "effective substitute", that is, that it retains any of its solvent properties. Safety-Kleen has not provided a MSDS or specification that continued-use solvent must meet.

Safety-Kleen has not compared continued-use solvent specifications to those of other dirty solvents marketed to the general public to demonstrate that the continued use solvent is a commercial product. Information provided to date has been MSDS on solvents before initial use.

GEORGE H. RYAN, GOVERNOR

Page 2

Drums which are used to store and transport non-hazardous Safety-Kleen's Solvent 150 are rewashed with virgin 150 solvent to remove any contamination from the washing with continued-use solvent.

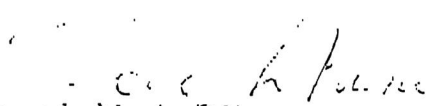
Spent solvents which are not placed into the continued-use program have historically been used by Safety-Kleen to clean the drums and are currently substituted for continued use solvent when it is not available. It does not appear that continued-use solvent program is the application of a product-like cleaning agent, but a continuation of rendering the drum RCRA empty using practices commonly employed to remove materials from that type of container.

2. The used solvent is not always used for washing drums that actually need it. Normally, a drum containing a cleaning solvent would not have to be washed. For the most part it appears that the continued-use solvents is routinely being used to clean the very drum that they were shipped in. Therefore, the solvent as received is considered to be waste.
3. The used solvents are used in excess of what would normally be required to wash the drum. According to the study Safety-Kleen performed approximately 90% of the drums can be cleaned only using 7.3 gallons. Yet Safety-Kleen proposes to set the drum washing machine at 13.3 gallons for each drum. The 13.3 gallons corresponds directly to the amount of solvent contained in a large number of the containers received by Safety-Kleen. Therefore, in many instances it takes one container of continued use solvent to clean one drum. The drum cleaned by the continued-use solvent may in fact be the same drum used to transport the continued-use solvent to the facility. Normal degreasing operations would include reuse of the solvent until it was no longer an effective substitute instead of discarding the solvent after one use.

In summary, the solvent is not required to meet specification, possess any specific cleaning abilities, be reused until it is no longer effective or otherwise managed as a commercial product.

Should you have any questions or comments regarding the contents of this letter, please contact Mark A. Schollenberger, P.E. of my staff at 217/524-3307.

Sincerely,


Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:MAS:bjh\2343.WPD

cc: Harriet Croke, USEPA Region V

bcc: Bureau File
DLC-Gurnik
FOS
Ted Dragovich
Chris Carnovsky
Rich Johnson
Mark Schollenberger
Angie Asbrock